

REMARKS

Claims 1-51 are pending. Claim 1 has been amended to incorporate limitations of Claim 3, and Claims 3 and 6 have been correspondingly amended. In addition, Claims 29 and 49 have been amended to further clarify that which was previously claimed. Support for the amendments to Claims 29 and 44 is included in at least paragraphs [00141] – [00144] of the specification. No new matter has been added. Reconsideration of the pending Claims is respectfully requested in view of the amendments to the Claims and the following remarks.

Allowed and Allowable Subject Matter

Applicants thank the Examiner for the indication that Claims 9-28 and 51 are allowed, and that Claims 33, 34, 49 and 50 are allowable if placed in independent form.

In that regard, Claims 33, 49 and 50 have been amended to be independent claims that include all the limitations of the respective base claims. Thus, Claims 33-34, 49 and 50 are allowable, and Applicants respectfully request such indication in a subsequent office action.

Commonly Owned Applications

Pursuant to 37 CFR §1.56, Applicant and Applicant's attorney hereby make of record in the above-identified patent application the existence of the following commonly owned patents published patent applications which are related to the above-identified patent application. The below identified co-pending published applications were cited in an information disclosure statement filed on November 13, 2007.

Applicants respectfully request the Examiner to review the claims and the prosecution history, including any Office Actions issued by the U.S. Patent and Trademark Office, for the following presently cited applications, since the specifications and possibly the claims of the following applications may include common or significantly related subject matter:

U.S. Patent Application No. 11/284,803 – Published on August 24, 2006, under Publication No. 2006/0188143 A1; and

U.S. Patent Application No. 10/519,252 – Published on May 25, 2006, under Publication No. 2006/0110026 A1.

Claim Rejections pursuant to 35 U.S.C. §102(b) and §103(a)

Claims 1-2, 6, 44, and 46-47 were rejected pursuant to 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,194,969 to DiFrancesco (hereinafter "DiFrancesco"). In addition, Claims 29-32 and 36-39 were rejected pursuant to 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,285,373 to Baldwin et al. (hereinafter "Baldwin"). Also, Claims 3-4, 7-8 and 45 were rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of the combination of DiFrancesco and U.S. Patent No. 5,471,572 to Buchner et al. (hereinafter "Buchner"). Further, Claims 5 and 48 were rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of the combination of DiFrancesco and U.S. Patent No. 5,802,361 to Wang et al. (hereinafter "Wang"). In addition, Claim 35 was rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of the combination of Baldwin and Wang, and Claims 40-43 were rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of the combination of Baldwin, Wang and design choice. Applicants respectfully traverse these rejections because the cited prior art either alone or in combination fails to teach, suggest or disclose each and every limitation of the presently pending Claims.

Claims 1-8

The method of amended Claim 1 describes creating a transformation procedure that forms the complex texture, storing the transformation procedure with a unique identifier, and associating the unique identifier with a surface of the electronic representation of the object. None of the cited references describe storing a transformation procedure with a unique identifier and associating the unique identifier with a surface of an electronic representation of an object.

To the contrary, DiFrancesco is silent regarding any form or stored transformation procedure, and Buchner describes a system for adding texture imagery to computer generated graphics that minimizes storage requirements of the data needed to create texture imagery. Specifically, Buchner describes a way to avoid storage of a high resolution texture map referred to

as a "source texture" by using a "base texture" and a "detail texture." (Col. 3, lines 56-65) The base texture is a low resolution version of the source texture. (Col. 3, lines 57-59) The detail texture is high resolution (or high frequency) piece of the source texture that is representative of the entire source texture when viewed with high resolution. (Col. 4, lines 32-47)

The detailed texture is combined with the base texture on a per pixel basis based on a magnification factor (or level-of-detail (LOD)) and the position of each pixel within an electronic representation of an object. (Col. 4, lines 8-12) The LOD is based on the rate of change of position, or texture address, across a texture being mapped onto an electronic representation. (Col. 4, lines 12-15) The LOD is used to create more (or less) detailed texture on the electronic representation to represent what the source texture would look like at the viewing distance. (Col. 4, lines 18-24) The detailed texture is scaled based on the LOD and the image content and combined with the base texture to generate a texture at the desired level of magnification. (Col. 5, lines 14-22) The base texture (LOD(0)) and one or more different levels of magnification of the detail texture image (LOD(1), LOD(2), etc.) (at least the highest resolution detail texture image) may be stored and used. (Col. 4, lines 54-63; Col. 6, lines 38-39)

Neither Buchner nor DiFrancesco teach, suggest or suggest the creation of a transformation procedure that reflects the transformation of a source texture as disclosed in Claim 1. In addition, storage of the transformation procedure in association with a unique identifier as described by Claim 1 is not taught, suggested or disclosed by Buchner or DiFrancesco. The association of the unique identifier with a surface of the electronic representation of an object and application of the complex texture to the surface based on the associated unique identifier as disclosed by Claim 1 is also not taught, suggested or disclosed by Buchner and/or DiFrancesco. Even if one assumes for sake of argument that the scaling of the detailed texture as taught by Buchner is somehow equivalent to Applicants' transformation procedure, which it clearly is not a procedure but rather a scaling factor, Buchner teaches storage of only the resulting scaled detail texture (Col. 4, lines 54-63), not a transformation procedure as described in Claim 1. Even if Buchner could somehow be construed to teach a transformation procedure, which is not taught, suggested or disclosed, Buchner still does not describe storing a transformation procedure with a unique identifier and associating the unique identifier with a surface of an electronic

representation of an object as described in Claim 1. Instead, Buchner simply refers to various resolutions of the textures as various levels of detail (LOD[n]) that are directly associated with the electronic representation.

Claims 29-32 and 35-36

Amended Claim 29 describes a graphical user interface component in communication with the library component, where the graphical user interface component is operable to capture a plurality of transformation operations applied by a user of the computer to the source texture to transform the source texture to form at least part of a complex texture, the graphical user interface component further operable to develop a transformation procedure comprising the captured transformation operations. None of the cited references teach or suggest a graphical user interface component operable to capture a plurality of transformation operations applied by a user of the computer to the source texture, nor that the graphical user interface component is further operable to develop a transformation procedure comprising the captured transformation operations as described in Claim 29. Instead, the cited portions of Baldwin simply describe retrieval of textures from a local library based on an index value (Col 4 lines 41-43) or retrieval of a texture identifier from a remote system so the corresponding texture can be retrieved from a local system (Col. 6 lines 8-34 and Figs. 3 and 4).

Claim 37-43

Claim 37 describes a source texture operation component operable to form a source transformation procedure as a function of transformation of the source texture, and a complex texture composition component operable to form a complex transformation procedure representative of a complex texture, where the complex transformation procedure and the source transformation procedure are combined to form a transformation procedure that is categorized in the complex texture category with a unique identifier. On page 5 of the office action mailed July 13, 2007, it was asserted that "claims 37 and 39 contain features that are analogous to the limitations recited in claims 29 and 30." Applicants respectfully traverse this assertion because limitations described in Claims 37 and 39 are not described in Claims 29 and 30.

For example, the limitations of a "source transformation procedure" and a "complex transformation procedure" are not mentioned in Claims 29 and 30. Thus, it follows that Claims 29 and 30 cannot possibly describe that the complex transformation procedure and the source transformation procedure are combined to form a transformation procedure that is categorized in the complex texture category with a unique identifier as further described in Claim 37. In fact, the office action mailed July 13, 2007 does not assert that any of the cited references meets these limitations as described in Claim 37, but rather simply disregards these limitations completely. Accordingly, it is respectfully requested that the rejection of Claim 37 be withdrawn as improper (See MPEP 707 and 37 CFR §1.104(b) and 37 CFR §1.104(c)), and a full examination on the merits of Claims 37 and 39 be issued in a non-final office action to allow the Applicants an opportunity to respond to such an examination.

Claims 44-48

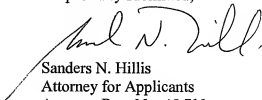
Amended Claim 44 describes instructions stored in the memory device to capture the transformation procedure as executable instructions, and instructions stored in the memory device to execute the transformation procedure to apply the complex texture to a surface of the electronic representation when the electronic representation is displayed. Neither DiFrancesco nor any other cited reference teaches or suggests such limitations. To the contrary, DiFrancesco is wholly silent on any form of capture of a transformation procedure as executable instructions or execution of such a transformation procedure to apply a complex texture to a surface of an electronic representation when the electronic representation is displayed.

For at least the foregoing reasons, the cited prior art does not teach or suggest each and every limitation of presently pending independent Claims 1, 29, 37 and 44 or the Claims dependent therefrom. Thus Applicants respectfully request withdrawal of the 35 U.S.C. §102 and 35 U.S.C. §103 rejections of these claims.

In view of the amendments to the Claims and the above remarks, the application is now in condition for allowance, which is respectfully requested. Should the Examiner deem a telephone conference to be beneficial in expediting examination and/or allowance of this

application, the Examiner is invited to call the undersigned attorney at the telephone number listed below.

Respectfully submitted,



Sanders N. Hillis
Attorney for Applicants
Attorney Reg. No. 45,712

BRINKS HOFER GILSON & LIONE
CUSTOMER NO. 27879
Telephone: 317-636-0886
Facsimile: 317-634-6701